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Attorneys for Complainant

BEFORE THE  
PHYSICAL THERAPY BOARD  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 1D-2003-63670

**LADD RYAN WILLIAMS**  
P.O. Box 2005  
Truckee, CA 96160

**A C C U S A T I O N**

Physical Therapist No. PT19517,

Respondent.

Complainant alleges:

PARTIES

1. Steven K. Hartzell ("Complainant") brings this Accusation solely in his official capacity as the Executive Officer of the Physical Therapy Board of California, Department of Consumer Affairs.

2. On or about December 15, 1993, the Physical Therapy Board issued Physical Therapist License Number PT19517 to Ladd Ryan Williams ("Respondent"). The Physical Therapist License was in full force and effect at all times relevant to the charges brought herein and will expire on April 30, 2005, unless renewed.

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3. This Accusation is brought before the Physical Therapy Board ("Board"),  
 majority of the following sections of the Business and Professions Code ("Code").

4. Section 2660 of the Code states:

The board may, after the conduct of appropriate proceedings under the Procedure Act, suspend for not more than 12 months, or revoke, or impose conditions upon, or issue subject to terms and conditions any license, certificate, or and under this chapter for any of the following causes:

(d) Conviction of a crime which substantially relates to the qualifications, functions, or duties of a physical therapist or physical therapy assistant. The record of conviction or a certified copy thereof shall be conclusive evidence of that conviction.

(i) Conviction of a violation of any of the provisions of this chapter or of the State Medical Practice Act, or violating, or attempting to violate, directly or indirectly, or assisting in or abetting the violating of, or conspiring to violate any provision or term of this chapter or of the State Medical Practice Act.

5. Section 2239 of the Code provides in relevant part that the use of any of beverages, to the extent, or in such a manner as to be dangerous or injurious to the any other person or to the public, or to the extent that such use impairs the ability to practice medicine safely, or more than one misdemeanor involving the use, or f alcohol constitutes unprofessional conduct.

6. Section 2661.5 of the Code states in relevant part that:

“(a) In any order issued in resolution of a disciplinary proceeding before the board, the board may request the administrative law judge to direct any licensee found guilty of unprofessional conduct to pay to the board a sum not to exceed the actual and reasonable costs of investigation and prosecution of the case.”

### FIRST CAUSE FOR DISCIPLINE

(Conviction of a Crime)

[Bus & Prof Code §§ 2660(d)(i) and 2239]

7. Respondent is subject to disciplinary action under sections 2660(d),

1 2660(i) and 2239 of the code in that on or about January 12, 2004 respondent suffered a  
2 misdemeanor conviction for a violation of Vehicle Code section 23152(b) (Driving a vehicle  
3 while having .08 percent or more of alcohol) in Nevada County Court case number T030770 and  
4 was sentenced to serve eleven days in the county jail, ordered to pay a fine of \$1849.25, ordered  
5 to have a restricted drivers license for eighteen months, and ordered to attend the First Offender  
6 drinking driver program.

7           The underlying circumstances were that on October 7, 2003, the Truckee Police  
8 Department received a call from an employee at Jacks Shell Station of a possible drunk driver  
9 about to leave the area driving a brown Ford Bronco. The Truckee Police Officer then  
10 observed the Ford Bronco, which was driven by respondent, nearly drive off the roadway two  
11 times. After respondent was stopped and arrested by Truckee Police, he gave a blood sample that  
12 revealed a blood alcohol level of .26 percent.

13                                   SECOND CAUSE FOR DISCIPLINE  
14                                   (Conviction of a Crime)  
                                  [Bus & Prof Code §§ 2660(d)]

15           8.       Respondent is subject to disciplinary action under sections 2660(d) of the  
16 code in that on or about April 19, 2004 respondent suffered a misdemeanor conviction for a  
17 violation of Vehicle Code section 14601.5 (Driving on a suspended license) in Nevada County  
18 Court case number T040148M and ordered to pay a fine of \$1268.50.

19  
20                                   PRAYER

21           WHEREFORE, Complainant requests that a hearing be held on the matters herein  
22 alleged, and that following the hearing, the Physical Therapy Board issue a decision:

23           1.       Revoking or suspending Physical Therapist License Number PT19517,  
24 issued to Ladd Ryan Williams;

25           2.       Ordering Ladd Ryan Williams to pay the Physical Therapy Board the  
26 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
27 Professions Code section 2661.5;

28           3.       Taking such other and further action as deemed necessary and proper.

1 DATED: August 9, 2005.

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Original Signed By:  
STEVEN K. HARTZELL  
Executive Officer  
Physical Therapy Board of California  
Department of Consumer Affairs  
State of California

Complainant